



National Oceanic and Atmospheric Administration
 1401 Constitution Avenue NW, Room 5128
 Washington, DC 20230
 SeafoodTrade.Strategy@noaa.gov

July 31, 2020

RE: RFI Response – Interagency Seafood Trade Task Force

This letter is submitted on behalf of Taylor Shellfish Farms (Taylor Shellfish) in response to the Department of Commerce and U.S. Trade Representative’s request for information to develop a comprehensive interagency seafood trade strategy. Taylor Shellfish is a fifth-generation family shellfish farming company headquartered in Washington State. The company grows a variety of oysters, mussels, clams, and geoduck for domestic and international sale, exporting about a third of its products to overseas markets, mainly in Asia. Taylor Shellfish has an interest in maintaining, reinforcing, and expanding trade opportunities for its products and appreciates being able to provide information for the Seafood Trade Task Force’s consideration.

Generally, Taylor Shellfish uses the following tariff codes:

LIVE/FRESH

PRODUCT	HS TARIFF No.
Pacific oysters (live)	0307.10
Clams	0307.91
Mussels	0307.31
Oyster Meat	0307.10

CANNED

PRODUCT	HS TARIFF No.
Smoked Oysters, 3 oz. various flavors	1605.51.40
Albacore Tuna, 3.5 oz. (no oil):	1604.14.22
Smoked Tuna, 3.5 oz. (no oil):	1604.14.22
Pacific Octopus, 3.5 oz.	1605.55.60
Smoked Mussels, 2.75 oz.	

Taylor Shellfish established a Central File Number (CFN) for the European Union (EU) around 1993 for exports to Belgium and the United Kingdom, and later Spain and Portugal. That number was also used to establish the company’s exports to Asia. Later, an Electronic List Module (ELM) was established with APHIS and used by the FDA, USDA, and USDC for trade. Taylor Shellfish was able to harmonize the CFN and ELM into a Food Establishment Indicator (FEI) number so the agencies could simplify documentation and registration, mostly for China.



However, the number does not work for any of the company's export health certificates. For that reason, to date, Taylor Shellfish has used its CFN for NOAA certificates to China.

Prior to a ban on shellfish between the U.S. and EU imposed a decade ago, Taylor Shellfish exported products to EU trading partners. For years, the FDA has told the shellfish industry that the barriers to EU shellfish trade are close to being lifted. U.S. farmers, including Taylor Shellfish, are eager for the necessary steps to re-establish trade be completed. This delay is especially disappointing during the COVID-19 pandemic. With European restaurants reopening, the company is anxious to access EU markets.

Taylor Shellfish sells a significant amount of its product in China, where there is strong demand for fresh shellfish, and the company would benefit from stability of trade. Between waves of COVID-19 and tense trade relations with the U.S., the Chinese market has been a roller coaster, becoming inaccessible unpredictably and costing the company in lost trade value. Taylor Shellfish plans its farming operations on 8-year rotations and, with trade to China so volatile, the company takes on risk that those markets will be unavailable when its crops become marketable. In addition to this unpredictability, high Chinese import tariff rates have made it harder for the company to sell into the country.

Also, it is not clear whether *Mytilus galloprovincialis* (Mediterranean mussel) and *Crassostrea gigas* (Pacific oyster) have been added to China's Approved U.S. Aquatic Species List. For that reason, Chinese customers must obtain an annual permit to allow those products to enter the country. Adding those products to the list would make export to China less burdensome and, also, the company's products more attractive for purchase.

Taylor Shellfish would also like to sell frozen oysters to an Australian customer and has petitioned the Australian government to allow import. Unfortunately, the petition process has proven to be onerous and lengthy. Taylor Shellfish recently learned that a full Biosecurity Import Risk Analysis (BIRA) must be completed but have been unable to determine whether the BIRA has been initiated. It is unclear what the appropriate next steps are, and the company has not received an official approval, denial, or request for information to respond to. Taylor Shellfish has little experience with the process and any assistance the U.S. government could provide in navigating it would help.

Please let me know if you have any questions, BillD@taylorshellfish.com.

Sincerely,

A handwritten signature in black ink that reads 'Bill Dewey'. The signature is written in a cursive, slightly slanted style.

Bill Dewey
Sr. Director of Public Affairs